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Attorneys for Plaintiff and the Putative Class

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

DOROTHY BURCHFIELD, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

COREL CORPORATION, a Canadian company,
COREL, INC., a Delaware corporation, and
WINZIP COMPUTING, S.L., a Spanish
company,

Defendants.

Case No. 5:13-cv-02025-LHK

**STIPULATED REQUEST FOR
EXTENSION OF THE DEADLINE FOR
PLAINTIFF TO FILE AN AMENDED
COMPLAINT; [PROPOSED] ORDER**

Action Filed: May 2, 2013

Judge: Honorable Lucy H. Koh

1 Plaintiff Dorothy Burchfield (“Plaintiff”) and Defendants Corel Corporation (“Corel
2 Corp.”), Corel, Inc. (“Corel, Inc.”), and WinZip Computing, S.L. (“WinZip”) (collectively,
3 “Defendants” or “Corel”), by and through their undersigned counsel, and pursuant to L.R. 6-2,
4 hereby stipulate and agree, subject to Court approval, to extend the deadline for Plaintiff to file her
5 first amended class action complaint from September 6, 2013 through and including September 11,
6 2013. In support of the instant stipulation, the Parties state as follows:

7 WHEREAS, on May 2, 2013, Plaintiff filed her putative class action complaint against
8 Defendants (Dkt. 1);

9 WHEREAS, on August 16, 2013, Defendants filed their motion to dismiss Plaintiff’s
10 complaint (Dkt. 29);

11 WHEREAS, in lieu of responding to Defendants’ motion to dismiss, Plaintiff intends to file
12 a first amended class action complaint as a right pursuant to Fed. R. Civ. P. 15(a)(1). (*See*
13 Declaration of Benjamin H. Richman, attached hereto as Exhibit 1 [“Richman Decl.”], at ¶ 3.) The
14 current deadline for Plaintiff to file her amended complaint pursuant to Fed. R. Civ. P. 15(a)(1) is
15 September 6, 2013—21 days after service of Defendants’ motion to dismiss (*Id.*);

16 WHEREAS, the Parties have conferred and agreed, subject to Court approval, to extend
17 Plaintiff’s deadline to file her first amended complaint through and including September 11, 2013 to
18 allow Plaintiff additional time to confer with her counsel and finalize the amended pleading (*Id.* at ¶
19 4);

20 WHEREAS, the requested extension is not brought for purposes of delay and such an
21 extension will not alter any hearing dates (*Id.* at ¶ 5);

22 WHEREAS, the Parties have not previously stipulated to extend the deadline for Plaintiff to
23 file an amended pleading;

24 NOW THEREFORE, the Parties hereby STIPULATE and AGREE as follows:

25 1. The deadline for Plaintiff to file her first amended class action complaint is hereby
26 continued from September 6, 2013 through and including September 11, 2013.

1 IT IS SO STIPULATED.

2 **DOROTHY BURCHFIELD**, individually and on
3 behalf of all others similarly situated,

4 Dated: September 6, 2013

By: /s/ Benjamin H. Richman
One of Plaintiff's Attorneys

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25 **COREL CORPORATION, COREL, INC., and**
26 **WINZIP COMPUTING, S.L.,**

27 Dated: September 6, 2013

By: /s/ Christopher D. Vieira
One of Defendants' Attorneys

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FILER'S ATTESTATION PURSUANT TO CIVIL LOCAL 5-1(i)(3)

I, Benjamin H. Richman, hereby certify that I am the ECF user whose identification and password are being used to file the foregoing *Stipulated Request for Extension of the Deadline for Plaintiff to File an Amended Complaint; [Proposed] Order*, and that the above-referenced signatory to this stipulation has concurred in this filing.

/s/ Benjamin H. Richman

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS ORDERED THAT:

The deadline for Plaintiff to file her first amended class action complaint is continued from September 6, 2013 through and including September 11, 2013.

ENTERED: _____

HONORABLE LUCY H. KOH
UNITED STATES DISTRICT JUDGE